

### **III. REMARKS**

Claims 1, 4-9 and 12-20 remain pending. Applicants have amended claims 1, 6, 8, 9, 14 and 17. Applicants do not acquiesce in the correctness of the rejections and reserves the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the claims in a subsequent patent application that claims priority to the instant application.

Claims 6-8 and 14-16 have been objected to because the phrases “using domain specific glossary”, “using domain specific thesaurus”, and “using domain specific ontology” should be replaced with “using a domain specific glossary”, “using a domain specific thesaurus”, and “using a domain specific ontology.” Applicants have amended claims 6 and 14 as suggested by the Examiner and the objection has been obviated. Claim 8 has been objected to, and rejected under 35 U.S.C. § 112 because “lining meta-data enhancer” is not supported in the specification. Applicants have amended claim 8 to cite “a linking meta-data enhancer.” Withdrawal of the objection and rejection under 35 U.S.C. § 112 for claim 8 is requested.

Claims 1, 4-5, 9, 12-13 and 17-18 have been rejected under 35 USC § 103(a) as being unpatentable over Davallou (US Pub. 2002/0156776), hereinafter “Davallou”, in view of Brill et al. (US Pub. 2004/0254920), hereinafter “Brill”. Claims 6-8, 14-16 and 19-20 have been rejected under 35 USC § 103(a) as being unpatentable over Davallou in view of Brill further in view of Whitman et al. (US Pat. 6,772,150), hereinafter “Whitman”. Applicants respectfully traverse this rejection.

The Examiner asserts that the combination of Davallou and Brill teaches “a search query analyzer using one or more of glossary terms, synonyms, known typographical errors and translated words to provide alternative query terms to original search query terms in the

unsatisfactory customer search queries.” Applicants have amended independent claims 1, 9 and 17 to include the element of “a search query analyzer using synonyms and optionally, one or more of glossary terms, ~~synonyms~~, known typographical errors and translated words to provide alternative query terms to original search query terms in the unsatisfactory customer search queries.” It is asserted that with this amendment, the Davallou and Brill combination falls outside the claims of the instant invention. Davallou relates to “phonetic self-improving search engines” (Abstract). Paragraph [0025] of Davallou relates to “phonetically equivalent formulas” and “commonly misspelled pronounceable units.” Never in Davallou is there a teaching or suggestion to use synonyms (that by definition are phonetically distinct) in a search query analyzer. Brill uses distributional analysis to determine distributional similarities between queries and although Brill is used to determine synonymous terms and term variations (paragraph [0049]), Brill does not teach or suggest “a search query analyzer using synonyms and optionally, one or more of glossary terms, known typographical errors and translated words to provide alternative query terms to original search query terms in the unsatisfactory customer search queries.” Thus, the combination of Davallou and Brill could not produce the element of “a search query analyzer using synonyms and optionally, one or more of glossary terms, known typographical errors and translated words to provide alternative query terms to original search query terms in the unsatisfactory customer search queries.”

Moreover, Applicants assert that the combination of Davallou and Brill does not show the element of “embedding in located relevant documents not found by the unsuccessful search queries those of the original unsuccessful search query terms not contained in those relevant documents.” The Examiner points to paragraph [0028] of Davallou which states that “the search string, the confirmed phonetic search string and the Internet Website address are stored in the

URL error database as an URL error memory record. However, there is never any embedding in the located relevant documents the original unsuccessful search query terms. As shown in the example of specification on page 8, lines 18-22, the meta-data enhancer adds the term “video player” to documents 410 and 412 in the text index. Embedding information in a document is never mentioned in Davallou, and Davallou only stores the web address, the search string and the confirmed phonetic search string (paragraph [0028]). The plain language of Davallou does not support the Examiner’s interpretation. Thus, Applicants assert Davallou never teaches or suggests embedding in the located relevant documents the original unsuccessful search query term. Brill does not correct this deficiency in Davallou. Therefore Applicants’ request removal of the rejection of claims 1, 4-5, 9, 12-13 and 17-18 under 35 USC § 103(a) over Davallou in view of Brill.

Whitman is cited for showing a sub-module that finds documents in identified subcategories using the original textual index. However, Whitman does not correct the deficiencies of the Davallou/Brill combination. Therefore, Applicants assert a proper prima facie obviousness rejection has not been presented for the rejection of claims 6-8, 14-16 and 19-20 and withdrawal of the rejection is requested.

Applicants respectfully submit that the application is in condition for allowance. If the Examiner believes that anything further is necessary to place the application in condition for allowance, the Examiner is requested to contact Applicants' undersigned representative at the telephone number listed below.

Respectfully submitted,

/Carl F. Ruoff/

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